
CAMBRIDGE CONTINUUM OF CARE GOVERNANCE CHARTER

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Introduction

Since the mid-1990s, Cambridge's Homeless Services Planning Committee (HSPC) has been convening regularly to coordinate programs and services for households experiencing homelessness in the City. This group, also known as the Continuum of Care (CoC), is a group of organizations and individuals working to address homelessness through a coordinated community-based process of identifying needs and building a system of housing and services to address those needs. The group is comprised of stakeholders who, as an administrative entity, coordinate a year-round planning effort and prepare the annual application for homeless services grants from the U.S. Department of Housing and Urban Development (HUD).

HEARTH Act amendments to the McKinney-Vento Homeless Assistance Act codified the role and functions of the CoC, formalizing the responsibilities of a CoC and establishing minimum requirements for its operation and management.

This governance charter:

- outlines the governance structure of the Cambridge CoC under the new CoC Program Interim Rule;
- defines the roles and responsibilities of the Board, Committees, Working Groups and staff; and
- establishes policies and procedures for operating and managing the CoC.

ARTICLE I. Name, Vision, Mission, Purpose and Responsibilities

- A. Name. The name of this unincorporated association is the Cambridge Continuum of Care (CCoC).
- B. Mission. The CCoC plans, develops and implements comprehensive and coordinated strategies to address homelessness in Cambridge.
- C. Vision. The vision of the CCoC is that in our community every person is appropriately, safely and decently housed. The CCoC works to alleviate homelessness through prevention, assistance toward self-sufficiency and the provision of a continuum of housing and service options.
- D. Purpose. The purposes of the CCoC are to:
 1. Promote communitywide commitment to implementing best practices to work toward the goal of ending homelessness in Cambridge;
 2. Maximize available funding for efforts by providers and government entities to prevent homelessness and quickly re-house homeless individuals and families in Cambridge, while minimizing the trauma and dislocation that homelessness causes to individuals, families and the community;
 3. Promote access to mainstream programs by homeless individuals and families, encouraging the full, effective use of available resources; and
 4. Improve self-sufficiency among individuals and families that experience homelessness.
- E. Responsibilities. The CCoC will fulfill the responsibilities assigned to continuums of care under [Title 24, Part 578 of the Code of Federal Regulations](#) and will satisfy all other legal requirements necessary to secure maximum funding under relevant state and federal programs to end homelessness.

ARTICLE II. Committee Structure, Designated Entities and Roles

A. Homeless Services Planning Committee (HSPC). The HSPC serves as the primary working entity of the CCoC. This committee is open to the public and meets once every other month to strengthen coordination and service delivery, and to carry out CoC responsibilities defined by the CoC Program Interim Rule. Primary responsibilities of the HSPC include:

- i. To convene regular meetings of the CCoC;
- ii. Elect the CCoC Board of Directors (open to CCoC voting members);
- iii. To establish performance targets and to monitor and act on outcomes;
- iv. To provide system coordination;
- v. To conduct the Point in Time (PIT) count, Housing Inventory Count (HIC) and Annual Gaps analysis;
- vi. To establish a coordinated system for individuals experiencing homelessness that provides a standardized process for assessing and prioritizing needs for housing or services across all providers; and
- vii. To establish and follow written standards for providing CoC assistance that at a minimum include:
 - a. Policies and procedures for evaluating individuals' eligibility for assistance;
 - b. Policies and procedures for determining and prioritizing which eligible households will receive transitional housing assistance;
 - c. Policies and procedures for determining and prioritizing which eligible households will receive rapid rehousing assistance;
 - d. Standards for determining what percentage or amount of rent each program participant must pay while receiving rehousing assistance;
 - e. Policies and procedures for determining and prioritizing which eligible households will receive permanent supportive housing assistance; and
 - f. A specific policy to guide the operation of the coordinated assessment system in addressing the needs of households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault or stalking, but who are seeking shelter or services from non-victim service providers.

Membership

Membership in the Cambridge CoC is open to any organization or individual interested in working to prevent and end homelessness in Cambridge. There are no membership dues and new members are welcome to join at any time. Annually, the CCOC issues an invitation for any interested organization or individual to become a member of the CCOC. The invitation is made public through the CCOC's website and through messages distributed by email and social media.

Members of the HSPC include representatives from relevant organizations and agencies working in Cambridge, Massachusetts, as well as individuals interested in working to address homelessness in the City. Relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, government entities, businesses, advocates, public housing agencies, school representatives, social service providers, mental health agencies, hospitals and health care practitioners, universities, affordable housing developers, law enforcement and organizations that serve veterans.

1. General Membership. Any organization or individual interested in addressing homelessness in Cambridge can join the CCOC as a non-voting general member. General members are encouraged to attend HSPC meetings and participate in Working Groups, and must attend at least one meeting per year to maintain membership.

2. Voting Membership. Voting members of the CCOC vote on issues related to governance of the CoC, priorities for funding competitions, and are responsible for electing members to the CCOC Board. Voting members must attend at least 75% of HSPC meetings over the course of a year (July – June) and/or actively participate in one of the CCOC’s Working Groups (attendance at 75% of meetings over the course of a year). Generally, votes will take place in-person at HSPC meetings, but certain time sensitive items may require online voting. To become a voting member of the CCOC, interested organizations and individuals must submit a CCOC Membership Application form, which is available on the CCOC’s website.

The following subcommittees of the HSPC are responsible for HMIS and Coordinated Entry management and oversight.

1. HMIS Working Group. The Homeless Management Information System (HMIS) Working Group meets quarterly to advise the operations, policies, and procedures of the CCoC HMIS implementation. This group oversees and informs operation of the HMIS by the designated HMIS Lead as outlined in the HMIS Governance Charter and works to monitor performance targets as established by the CCoC.
2. Coordinated Entry Working Group. The Coordinated Entry Working Group convenes regularly to advise the operations, policies, and procedures of the CCoC’s Coordinated Entry system.

Additionally, members of the HSPC may form topic and/or subpopulation focused Working Groups or subcommittees as deemed necessary or useful to the overall functioning of the CCoC. Examples of the focus areas of these Working Groups include: Veterans; Youth; Families with Children; Individual Shelters; Point-in-Time Count, etc. When such groups form, information about agendas and how to join Working Groups will be circulated broadly throughout the CCoC via the CCoC’s social media accounts, the CCoC website, and the CCoC monthly newsletter.

B. Designated Entities.

1. Collaborative Applicant. The City of Cambridge Department of Human Service Programs (DHSP) is the designated Collaborative Applicant for the CCoC. The Collaborative Applicant is the eligible applicant that submits the annual CoC Consolidated Application for funding on behalf of the CoC. The Collaborative Applicant is the only entity that can apply for a grant for Continuum of Care planning funds on behalf of the CoC.
2. HMIS Lead. DHSP is the designated HMIS Lead for the CCoC. See attached HMIS Governance Charter for detailed Roles and Responsibilities.
3. Support Entity. As the designated Collaborative Applicant and HMIS Lead, DHSP staff play a significant role in supporting the operation and management of the CCoC and its HMIS system. DHSP staff coordinate and facilitate CCoC meetings, distribute written meeting agendas and minutes, maintain CCOC membership records, manage the content of the CCoC website and newsletter, staff the CCoC Board, HSPC and its subcommittees, coordinate the annual PIT and HIC and, with the oversight of the CCoC Board, design, operate and follow a collaborative, fair and transparent process for developing applications in response to CoC Program NOFAs. Additionally, DHSP staff participate in and represent the CCoC in the City’s Consolidated Plan and ESG allocation and reporting processes. DHSP staff members are also active participants in regional and State groups meeting to coordinate efforts related to provision of ESG and CoC funds.
 - i. CoC Program NOFA Scoring: To review, score and rank projects, the Support Entity Staff, as the Collaborative Applicant, will follow a fair, inclusive, and transparent process, that will be communicated to all interested parties via CCoC meetings, CCoC social media accounts, the CCoC website, CCoC newsletter, and direct communication with interested parties.

1. Scoring: Support Entity staff, namely the CoC Planner, will score all projects using objective criteria to evaluate past performance, and assessments of the degree to which projects improve the CoC's system performance, progress towards meeting Federal Strategic Plan goals, and contributions to local funding priorities. The CoC Planner will complete a NOFA scorecard for each renewal project. The NOFA scorecard includes objective data agreed upon by the CoC's Homeless Services Planning Committee and the CoC's Evaluation Panel. Data sources include projects' Annual Performance Report (APR), and DHSP's records related to timely submission of data reports. First time renewals and projects without a full year of performance data will be assigned the median score and if necessary, will be ordered based on Evaluation Panel scores from their original application for funding. Project scores for new project proposals will be completed by the Evaluation Panel based on submitted proposals using the criteria published in the New Project Proposal form. All scorecards will be reviewed for accuracy by a second Support Entity staff person.
 2. Ranking: The CCoC Board is responsible for ranking and will establish an Evaluation Panel, which will include only those Board Members who do not have a financial interest in the projects being ranked for the annual competition. The Evaluation Panel will review ranking strategies prepared by the Support Entity that are based, in part, on the scoring process referenced in Section B.3.i.1.
- C. CCoC Board. The CCoC Board meets quarterly to oversee the work of the designated entities, the HSPC and its subcommittees defined above. The Board is responsible for ensuring that the CCoC fulfills the responsibilities assigned to continuums of care under Title 24, Part 578 of the Code of Federal Regulations and oversees progress toward meeting local, regional and federal goals to prevent and end homelessness. The CCoC Board is also responsible for establishing priorities for funding projects under the CoC Programs, and for ranking multiple applications if required by HUD in the Notice of Funding Availability (NOFA). The CCoC Board will form an Evaluation Panel to fulfill responsibilities related to CoC funding to ensure allocation and ranking decisions are made by individuals with no financial interest in the decisions made.

The City of Cambridge, the recipient of formula-based Emergency Solutions Grant (ESG) funds for the CCoC's geographic area, will consult with the CCoC Board to review ESG outcomes, funding priorities and allocations. When selecting subrecipients for ESG funding, the City will invite CCoC Board members without conflicts of interest to participate in the decision-making process.

ARTICLE III. CoC Board Policies and Procedures

- A. Number, Composition and Terms. The CCoC Board, established August, 2014 consists of an odd number of CCoC members with at least 50% elected at any given time. The Board must be representative of the CCoC organizations identified in Article II and the projects serving the various homeless subpopulations in Cambridge. The Board will include:
- a. Elected seats:
 - i. Representatives of organizations providing housing or services for persons experiencing homelessness;
 - ii. At least one homeless or formerly homeless individual;
 - iii. Members from the public and private sectors; and
 - iv. A member from at least one ESG recipient or subrecipient organization in the CCoC.
- No more than one representative of a single organization or group may be elected to the CCoC Board.
- b. Appointed seats:
 - i. Collaborative Applicant (DHSP);

- ii. Consolidated Plan entity (Cambridge Community Development Department);
- iii. Cambridge Housing Authority; and
- iv. HMIS Lead (DHSP).

CCoC Board members will serve terms of three years. Board members may be reappointed or reelected for subsequent three year terms With no limit on the number of terms a member may serve. Board members may resign from the Board at any time by providing written notification to the Board Chair. If a Board member is removed or resigns, the Support Entity (DHSP) will solicit nominations from CCoC members and develop a slate of candidates for election to the Board.

- B. Board Member Nominations and Elections. Every three years, or more frequently depending on turnover of Board members, the Support Entity will solicit nominations from CCoC members and other members of the community interested in working to solve the issue of homelessness in the CCoC, and develop a slate of candidates for election to the Board giving preference to candidates who:
- a. Help satisfy the Board composition requirements defined above;
 - b. Have been nominated repeatedly by a significant cross-section of members;
 - c. Bring valuable experience and expertise to the Board; and
 - d. Have demonstrated interest, diligence and effectiveness in working toward the CCoC’s mission.

Existing CCoC Board members will review all nominations for open Board seats and compile a slate of candidates to present to the Voting members of the CCOC who will elect new members from the slate of candidates by majority vote.

- C. Code of Conduct, Conflicts of Interest and Recusal Process. CCoC Board members must exercise care when acting on behalf of the CCoC. These individuals must complete the work they have agreed to undertake in a timely manner. In addition, they must attend Board meetings and be prepared to discuss matters presented for their deliberation. Absence without notice or explanation for three meetings within a calendar year or repeated failure to complete work assignments will be grounds for removal from the Board. Repeated failure to participate thoughtfully and respectfully in discussions or persistent disruptive or obstructive conduct during meetings will be grounds for removal.

CCoC Board members must abide by the following rules in order to avoid conflicts of interest and promote public confidence in the integrity of the CCoC and its processes. Failure to honor these rules will be grounds for removal from the Board and any of its committees.

1. Members may not participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefit to:
 - a. Any organization that they or a member of their immediate family represents; or
 - b. Any organization from which they or a member of their immediate family derives income or anything of value.
2. Whenever CCoC Board members or any member of their immediate family have a financial interest or any other personal interest in a matter coming before the Board or one of its committees, they must:
 - a. Fully disclose the nature of the interest; and
 - b. Withdraw from discussing, lobbying and voting on the matter.

At the beginning of every Board meeting, the Chair must ask if there are any conflicts of interest or potential conflicts of interest that need to be disclosed before the business included in the meeting’s agenda is discussed.

Any matter in which CCoC Board members have an actual or potential conflict of interest will be decided only by a vote of disinterested individuals. The minutes of any meeting at which such a vote is conducted must

reflect the disclosure of interested directors' actual or potential conflicts of interest and their recusal from participation in the decision. CCoC Board members must sign a conflict of interest form annually, affirming that they have reviewed the conflict of interest policy and disclose any conflicts of interest they face or are likely to face in fulfilling their duties as Board members.

- D. Voting Quorum. A majority of the membership of the Board, as the decision-making body of the CCoC, constitutes a quorum at all meetings of the CCoC Board. If 51% of the membership of the Board is not in attendance at a meeting, no votes may take place during the meeting.

ARTICLE IV. Approval of Charter and Subsequent Amendments

- A. Scope of the Governance Charter. The CCoC Governance Charter establishes a framework for governing the Continuum as well as roles and responsibilities related to establishment of policies and procedures needed to comply with 24 CFR Part 578.
- B. Approval and Subsequent Amendments. The governance framework outlined in this document and every subsequent amendment to that framework must be approved by a majority of CCoC members.
- C. Regular Reviews of the Governance Charter. In consultation with the Collaborative Applicant and the HMIS Lead, the HSPC will review the charter annually and recommend to the Board changes to improve the functioning of the CCoC and maintain compliance with federal regulations. Every five years after initial approval of the charter, the CCoC Board will invite interested members to participate in a review and discussion of the Board selection process. Based on the consensus achieved in that discussion, the Board will ask HSPC members to ratify the existing selection process or approve proposed changes to that process at their next monthly meeting.

APPENDIX A: HMIS Governance Charter

Purpose

The purpose of the Cambridge Homeless Management Information System (CHMIS) is to provide a robust and comprehensive system for collecting and disseminating information about persons experiencing homelessness and the homelessness service system in the City of Cambridge. The long-term vision of HMIS is to enhance Partner Agencies' collaboration, service delivery and data collection capabilities.

The mission of the Cambridge Continuum of Care HMIS is to be an integrated network of homeless and other service providers that use a central database to collect, track and report uniform information on client needs and services. This system will meet Federal requirements and enhance coordination for service planning and delivery.

The fundamental goal of CHMIS is to document the demographics of homelessness in Cambridge according to the HUD HMIS and Data Standards. The project aims to identify patterns in the utilization of assistance, and document the effectiveness of services for clients. This will be accomplished through analysis of data that are gathered from the actual experiences of individuals and families experiencing homelessness and from the service providers who assist them in shelters and homeless assistance programs throughout the City.

Charter Definition

This document defines the governance structure of the CHMIS. The charter is intended to be used as a statement of the roles and responsibilities of the HMIS Lead Agency, the CoC Lead Agency and the HMIS Working Group as they relate to managing the CHMIS.

Roles & Responsibilities

The City's Planning and Development Division within the Department of Human Service Programs (DHSP) staffs and is the lead agency for both the CoC and the CHMIS. HMIS Project Staff are responsible for the administration of the web-based application and user access. HMIS Project Staff also provide technology, training and technical assistance to users of the system throughout the City.

The HMIS Working Group provides important oversight and guidance to HMIS. This group is committed to balancing the interests and needs of all stakeholders involved: individuals and families experiencing homelessness; service providers; case managers and end users; funders; and policymakers.

City of Cambridge Continuum of Care

HMIS Working Group – members must be active HMIS users and/or manage staff using HMIS.

- Project direction and guidance – includes oversight of implementation of the HMIS
- Approval of HMIS project forms and documentation
- Project participation and feedback

- Prioritization of issues

City of Cambridge, DHSP

Planning and Development Division

- Lead agency for HMIS administration and overall responsibility for project
- Project funding
- Responds to CoC directives
- Oversees the day-to-day administration of the HMIS system
- Provides technical support to participating agencies
- Ensures system integrity and availability
- Ensures HMIS software is capable of producing required reporting
- Liaison with HUD
- Provides staffing for operation of HMIS
- Procurement of software and licenses
 - Selection of system software solution
- Manage contract with software vendor
- User Administration
 - Add and remove partner agency HMIS Administrator
 - Manage user licenses
- Creation of project forms and documentation
- Project policies and procedures compliance
- Signatory for Partner Agency Agreements
- Keeper of Signed Partner Agency Agreements

Training Responsibilities

- Adherence to HUD Data Standards*, Security Plan and Privacy Plan
- Application customization
- Curriculum development
- Training documentation
- Privacy and Security training
- Outreach/end user support
- Training schedule
- Helpdesk support

Data Management and Stewardship

- Adherence to HUD Data Standards*
- Application customization
- Regularly reviews data quality and reports to CoC and CoC Board

- Aggregate reporting and extraction
- Assist Partner Agencies with agency-specific data collection and reporting needs (within reason and within constraints of other duties)

*HUD Data Standards and HMIS Requirements: <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf>

Meetings

HMIS Project Staff within the HMIS Lead Agency convene HMIS meetings every other week. These meetings allow HMIS staff to check in with DHSP grant managers on HMIS issues including software bugs, reporting (APRs), project development, HMIS trainings, etc.

The HMIS Working Group meets quarterly to inform and advise the operations, policies and procedures of the CHMIS implementation and to provide feedback from end users on a regular basis.

Additionally, HMIS Project Staff attend all monthly CoC meetings to report to the larger group on progress, updates and issues related to HMIS. CoC members are invited to participate in the HMIS Working Group, and are given an opportunity to provide feedback on the HMIS implementation to both HMIS Working Group members and HMIS Project Staff.

Partner Agency

Any agency, group, or other entity that has completed an Agency Agreement with DHSP is a Contributory HMIS Organization (CHO), or Partner Agency. All Partner Agencies must abide by all policies and procedures outlined in this manual, which are subject to change. Partner Agencies must complete an Agency Agreement with DHSP before gaining access to HMIS. Partner Agencies are responsible for the conduct of their End Users and the security of End User Accounts.

Partner Agency Executive Director

- Authorizing agent for Partner Agency Agreement
- Designation of HMIS Agency Administrator
- Agency compliance with Policies & Procedures
- Each Partner Agency is responsible for ensuring they meet the Privacy and Security requirements detailed in the HMIS Data and Technical Standards. Annually, Partner Agencies will conduct a thorough review of internal policies and procedures regarding HMIS.

Partner Agency Administrator

Each Partner Agency will designate an HMIS Agency Administrator to serve as primary contact between DHSP and the Partner Agency, and send that person's name and contact information to HMIS Project Staff. Changes to that information should be promptly reported to DHSP. HMIS Agency Administrators are responsible for:

- Program compliance with Policies & Procedures
- Authorizing agent for Partner Agency User Agreements
- Keeper of Executed Client Informed Consent forms
- Authorizing Agent for User ID requests
- Internet connectivity
- End user adherence to workstation security policies
- Detecting and responding to violations of the Policies & Procedures
- Maintain agency/program data in HMIS application
- Authorizing agent for Data Quality Monitoring

Agency Staff

- Safeguard client privacy through compliance with confidentiality policies
- Data collection as specified by training and other documentation

Non-Cambridge HMIS Partner Agency

Non DV Provider Agencies using a comparable HMIS must provide DHSP access to their HMIS system. Non-CHMIS Partner Agencies must assign a staff member to be the primary point of contact with HMIS Project Staff.

APPENDIX B: Coordinated Entry Steering Committee

Purpose

The Cambridge CoC Coordinated Entry Steering Group is a group of Cambridge CoC members charged with informing the ongoing development and direction of our local Coordinated Entry system, the Cambridge Coordinated Access Network (“C-CAN”). The CE Steering Group’s primary formal responsibility is oversight of the C-CAN policies and procedures, which are located at www.cambridgecoc.org/ccan-procedures.

A. Membership and Staffing

1. Any individual CoC member in good standing, or any individual whose work involves Cambridge programs as part of an agency that is a CoC member in good standing, may automatically become a member of the CE Steering Group by filling out a brief application that will be publicized to the CoC. Any individual or agency who ceases to become a CoC member will also cease to become a member of the CE Steering Group. Note that whereas general CoC membership is on a mixed individual/agency basis, CE Steering Group membership is on an individual basis like the CoC Board and HMIS Working Group. There is no set limit to the number of individuals from the same agency who can be CE Steering Group members.

2. Any CE Steering Group member who fails to indicate their response to two consecutive announcements of proposed changes will be removed from membership and would need to re-apply if they wish to re-join.

3. We seek to have a diverse Steering Group that reflects the demographics of our CoC and community, and, in particular, one that has meaningful representation in the decisionmaking process from CoC colleagues and stakeholders who are people of color, as we use our Coordinated Entry resources to advance racial equity goals within our homeless services system.

4. The CE Steering Group is staffed by the Coordinated Entry Project Manager on behalf of the CoC lead agency, the Cambridge Department of Human Service Programs’ Planning and Development team (“Planning and Development”).

B. Changes to the C-CAN Policies and Procedures

1. Upon the adoption of this governance document, all substantive changes or additions to the C-CAN Policies and Procedures must be subject to the approval process outlined here. DHSP Planning and Development staff may make edits for the sake of clarity without approval, where edits do not change the substance of a policy or procedure.

2. Planning and Development will email any proposed change or addition to the Policies and Procedures to all Steering Group members at least one week in advance of their proposed taking-effect. Planning and Development will endeavor to provide as much information as possible to help members make an informed decision and understand why the change is being proposed.

3. Upon announcement of a proposed change, each member of the Steering Group is expected to indicate in response that they “Approve” the change, “Reject” the change, or “Acknowledge Receipt” of the change.

4. If any two or more Steering Group members who do not represent the same agency “Reject” a proposed change, it cannot be automatically approved at the Steering Group level. Planning and Development may consequently either choose to withdraw the proposed change, or bring it forward to the CoC Board for a vote to approve or reject the change, on a majority basis. This vote is not required to occur in a synchronous meeting and may take place via email. If the Board approves the change, it will take effect on the proposed date (or immediately if that date has passed). If the Board rejects the change, it will be withdrawn.

5. “Acknowledging Receipt” of a proposed change is a response a Steering Group member may indicate in order to maintain their membership (per A.2 above) if they do not feel able to “Approve” or “Reject”. However, members are expected to be engaged in understanding policy proposals and are discouraged from using this response frequently.

6. If a proposal is not “Rejected” by two or more members who are not from the same agency (per B.4 above), including if a proposal is “Rejected” by just one member, it will take effect on the proposed date and the Policies and Procedures will be updated at that time to reflect such.

7. Any member of the CE Steering Group may put forward a proposed change to the Policies and Procedures by contacting the Coordinated Entry Project Manager. If Planning and Development endorses the change, it will be then be formally proposed following the process above. If Planning and Development does not endorse the change, it is considered “Rejected” at the Steering Group level and the proposing member has the option to either withdraw it or have it put forward to a CoC Board vote per the process in B.4 above. Planning and Development may reject a proposed change without the possibility of a CoC Board vote under one of the following circumstances:

a) There is no viable means to implement the proposed change without violating HUD regulations or local, state, or federal law.

b) The change falls outside of the scope of the C-CAN Policies and Procedures (in which case Planning and Development will help identify a more appropriate avenue).

8. Steering Group members who have ideas for changes are strongly encouraged to seek guidance from the Coordinated Entry Project Manager in crafting a proposed change, before formally putting a proposal forward.

C. Other Activities

In addition to the formal process for proposing policy changes, Planning and Development may also convene more open-ended meetings to draw on Steering Group member knowledge in shaping the direction of policy proposals.